

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CRIMINAL NO. 21-255) (NEB/ECW)

United States of America,

Plaintiff,

vs.

MOTION TO
CONTINUE
TRIAL

Christopher Allen Edwards,

Defendant.

The defendant, Christopher Allen Edwards, by and through his attorney, Douglas Altman, moves the Court for an order to continue the trial of this case, currently set for October 24, 2022, for the reason that Mr. Edwards' investigator, Michael Grostyan, has contracted COVID and will be unavailable to assist him in a trial three days away. In support of this Motion, Mr. Edwards asserts the following:

1. Shortly after Mr. Edwards was charged with felony drug offenses, his counsel arranged for Mr. Grostyan's investigative services. Given the pandemic, most face-to-face conferences were conducted by ZOOM, and of the approximate 15 ZOOM conferences, Mr. Grostyan participated in practically every meeting.

2. In addition to the ZOOM conferences, Mr. Grostyan

took an active role in counselling Mr. Edwards and formulating defense strategies.

3. Counsel anticipated that Mr. Grostyan's "defense case agent" role would continue through trial. While it was extremely unlikely that he would testify, his performance of even clerical tasks would significantly assist Mr. Edwards and his counsel. In short, he played a significant role on the defense team.

4. Counsel learned yesterday that Mr. Grostyan had tested positive for COVID and would be unavailable to assist Mr. Edwards in his upcoming trial.

5. In summary, for the reasons above, Mr. Edwards respectfully moves the Court for a continuance of trial pending Mr. Grostyan's full recovery from COVID.

Dated: October 21, 2022

s/ Douglas B. Altman
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